IN THE UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF TENNESSEE WESTERN DIVISION

SCOTT TURNAGE, CORTEZ D. BROWN, DEONTAE TATE, JEREMY S. MELTON, ISSACCA POWELL, KEITH BURGESS, TRAVIS BOYD, TERRENCE DRAIN, and KIMBERLY ALLEN on behalf of themselves and all similarly situated persons,

Plaintiffs,

V.

BILL OLDHAM; FLOYD BONNER, JR.; ROBERT MOORE; KIRK FIELDS; CHARLENE MCGHEE; REGINALD HUBBARD; DEBRA HAMMONS; TIFFANY WARD; SHELBY COUNTY, TENNESSEE; TYLER TECHNOLOGIES, INC.; GLOBAL TEL*LINK CORPORATION; SOFTWARE AG USA, INC.; SIERRA-CEDAR, INC.; SIERRA SYSTEMS GROUP, INC.; and TETRUS CORP.,

Defendants.

Civil Action No. 2:16-cv-02907-SHM-tmp

(Hon. Judge Samuel H. Mays)

SECOND REVISED NOTICE TO TAKE THE DEPOSITION OF ED RAPER

To: Ed Raper

c/o Robert E. Craddock, Esq.

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-and-

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Please take notice that pursuant to Rule 30(a)(1) of the Federal Rules of Civil Procedure,

Plaintiffs Scott Turnage, Cortez D. Brown, Deontae Tate, Jeremy S. Melton, Issacca Powell,

Keith Burgess, Travis Boyd, Terrence Drain, and Kimberly Allen will take the deposition of Ed

Raper at the law offices of BLACK MCLAREN JONES RYLAND & GRIFFEE, P.C., 530 Oak Court

Drive, Suite 360, Memphis Tennessee 38117, commencing on March 6, 2020 at 9:30 a.m.,

Central Standard Time, and continuing thereafter from hour to hour and day to day until

complete.

The deposition will be taken on behalf of Plaintiffs for the purposes of discovery, use as

evidence, preservation of testimony, and all other purposes authorized by law and will be

recorded by a certified court reporter, who will record the deposition by means of stenograph

and/or audio recordings. The deposition may also be recorded by video or other visual and

electronic means.

Respectfully submitted,

s/ William E. Routt

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CERTIFICATE OF SERVICE

I hereby certify that on this 7th day of February, 2020, a true and correct copy of the foregoing pleading has been filed electronically with the Court's Electronic Case Filing System. Pursuant to the Court's ECF System, the following parties listed below are filing users who will receive notice of the foregoing document's filing:

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